

Ex. 6 - Personal Privacy

Sent: Wed 6/22/2016 3:13:09 PM

Subject: Reminder: PFAS - States/EPA Roundtable Call Tomorrow - June 23rd - and AFFF disposal info

02 Chap2 CDV.PDF

Seow WA-DEC PFCs Firefighting Foam final version 7June2013.pdf

To: NEWMOA PFAS Working Group

A quick reminder that our **states/EPA roundtable conference call is Thursday June 23rd from 1:30 to 3:30**. The call-in number is: (513) 386-0000 and the access code is: 379391#. On this call, we'll determine the standing monthly week/day/time for this monthly states/EPA roundtable call. See below for the tentative call agenda (I think we'll only get through #1 on this first call) – and below that, information provided by EPA Region 2 regarding PFAS and waste treatment/disposal:

1. Treatment/Disposal of wastes containing PFOS and PFOA (see attached “02 Chap2 CDV.PDF” for some general information)
 - a. How are we advising people to dispose of AFFF (CERCLA liability for landfill disposal)
 - b. How effective is solidification with Portland Cement at preventing leaching (EPA method 1315)
 - c. Thermal treatment (MSW incinerators have refused PFC containing materials in NY due to air emission concerns)
2. Investigation of sites
 - a. Conceptual model of source material remaining from AFFF release (microscopic analysis?)
 - b. Cross contamination of samples (lab equipment, sampling equipment, clothing)

- c. Update for ongoing investigations (lessons learned)
- 3. Remediation
 - a. Effectiveness of ISS for source areas.
 - b. Thermal desorption for contaminated soils
 - c. In-situ carbon (funnel and gate, PlumeStop)

Information provided by EPA Region 2:

- Laboratory Scale Incineration Testing of Fluorotelomer-Based Polymers: Final Enforceable Consent Agreement (ECA) and Testing Consent Order; Docket ID number EPA-HQ-OPPT-2004-0001.
- Laboratory Scale Incineration Testing of Fluoropolymers: Final Enforceable Consent Agreement (ECA) and Testing Consent Order; Docket ID number EPA-HQ-OPPT-2003-0071.
- Best Practices Document by Fire Fighting Foam Coalition (FFFC): <http://www.ffc.org/images/bestpracticeguidance2.pdf>
- Australia document (see attached – Seow doc)
- Canada regulations: <https://www.ec.gc.ca/toxiques-toxics/default.asp?lang=en&n=25259B8F-1>
- EU regulations (Directive 2006/122/EC): <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2006:372:0032:0034:en:PDF>

Additional notes:

- EPA regulations restrict the production and importation of PFOS-based products, including firefighting foams. However, the Agency's SNUR regulations do not affect the continued use of existing stocks of the PFOS-based chemicals that had been manufactured or imported into the U.S. before SNURs took effect in 2002. More information of PFOS regulation under the Toxic Substances Control Act (TSCA): <https://www.gpo.gov/fdsys/pkg/FR-2002-03-11/html/02-5746.htm>.
- Canada and EU have banned the use of C8-based AFFF (except for some critical uses) and require these foams to be disposed as hazardous waste.

- The preferred method to dispose and degrade C8 foam stock is high temperature thermal incineration (at greater than 1100 degrees C due to the stability of C-F bond).